

# **EXHIBIT 77**

# **REDACTED**

# Exhibit A

# Corporate Regulatory Compliance Update: Prescription Drug Diversion Control Program

Chris Zimmerman, VP & Chief Compliance Officer  
David May, Sr. Dir., Diversion Control & Federal  
Investigations

Meeting of the Audit & Corporate Responsibility Committee  
March 4, 2015



ABDC-SC Req. 0740

SC Rule 408 Material  
Business Confidential - SC FOIA Exempt

# Agenda

- I. Diversion Control Program - Overview
- II. Diversion Control Program - Enhanced Systems & Processes
- III. Diversion Control Program - Revised Threshold Methodology
- IV. Diversion Control Program - Conclusion

Appendix A: Diversion Program Enhancements: Reporting & Analytics



# I. Diversion Control Program - Overview

## Update

- On November 14, 2012, I made a presentation to the Audit and Corporate Responsibility Committee on the subject of Prescription Drug Diversion and ABC's Diversion Control Program in place to prevent diversion and comply with state and federal regulatory requirements.
- ABC continues to improve its program and has made considerable enhancements to the Diversion Control Program in the following areas:
  - Personnel
  - Systems
  - Process
  - Education & Training



## I. Diversion Control Program - Overview

### Personnel

In February 2014, in support of AmerisourceBergen's mission to help prevent prescription drug diversion and abuse and to ensure patient access to critical medications, Corporate Security and Regulatory Affairs (CSRA) added the following resources to the CSRA Diversion Control team:

#### **David May, Senior Director, Diversion Control & Federal Investigations**

David is responsible for all aspects of the company's Diversion Control Program as well as all federal investigations. Prior to AmerisourceBergen, David joined the Drug Enforcement Administration (DEA) as a Special Agent in 1985. In this role, he targeted violent drug trafficking and money laundering organizations. He also had oversight for all DEA operations in Europe, Africa and the Middle East. David also briefed DEA's executive staff, members of Congress and various defense officials on U.S. interests in this important geographical area. Back in the U.S., he designed and implemented a comprehensive strategy to reduce the availability of illegally-diverted pharmaceuticals and controlled chemicals in Georgia. David holds a degree in criminal justice from Northeastern University.

#### **Sharon Hartman, RPh, Director, Pharmacy Compliance & Diversion Control**

Sharon is responsible for supporting all aspects of the Diversion Control Program, and she will serve as our subject matter expert regarding appropriate pharmacy dispensing protocol and drug interactions. Prior to joining AmerisourceBergen, Sharon spent more than 15 years assisting in the development, implementation and support of PharMerica's regulatory compliance program serving most recently as the Corporate Director of Regulatory Compliance. Sharon has over 30 years of industry experience as a registered pharmacist in retail and long-term care pharmacy operations, reimbursement and regulatory compliance. Sharon holds a degree in pharmacy from Purdue University.





## I. Diversion Control Program - Overview

The DEA perspective

- DEA Administrator Michelle Leonhardt testimony before the House Appropriations Committee in April, 2014:
  - “The threat from prescription drug abuse is persistent and deaths caused by it outnumber those for heroin and cocaine combined”.
  - “Prescription drug abuse is the nation’s fastest-growing drug problem”.

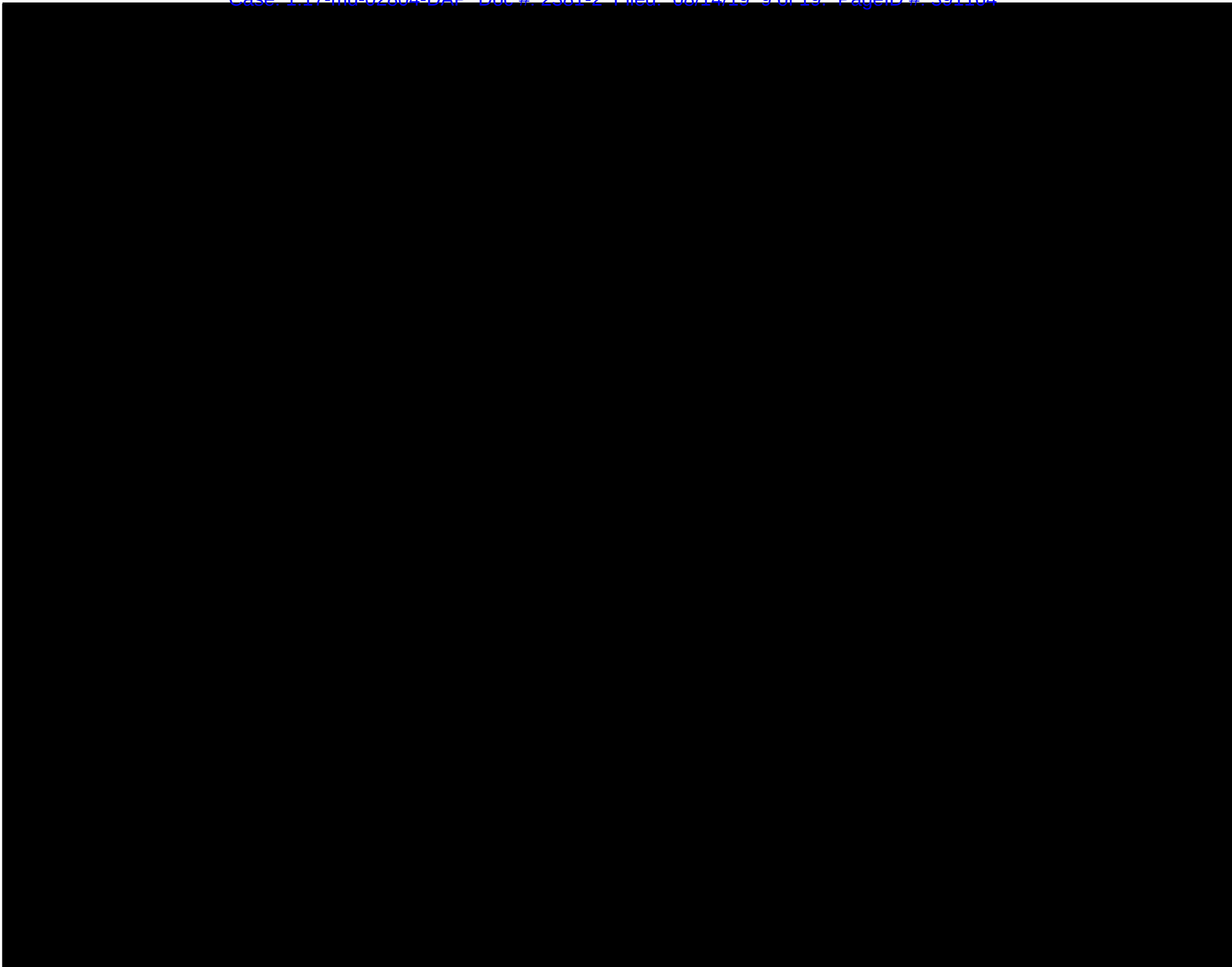


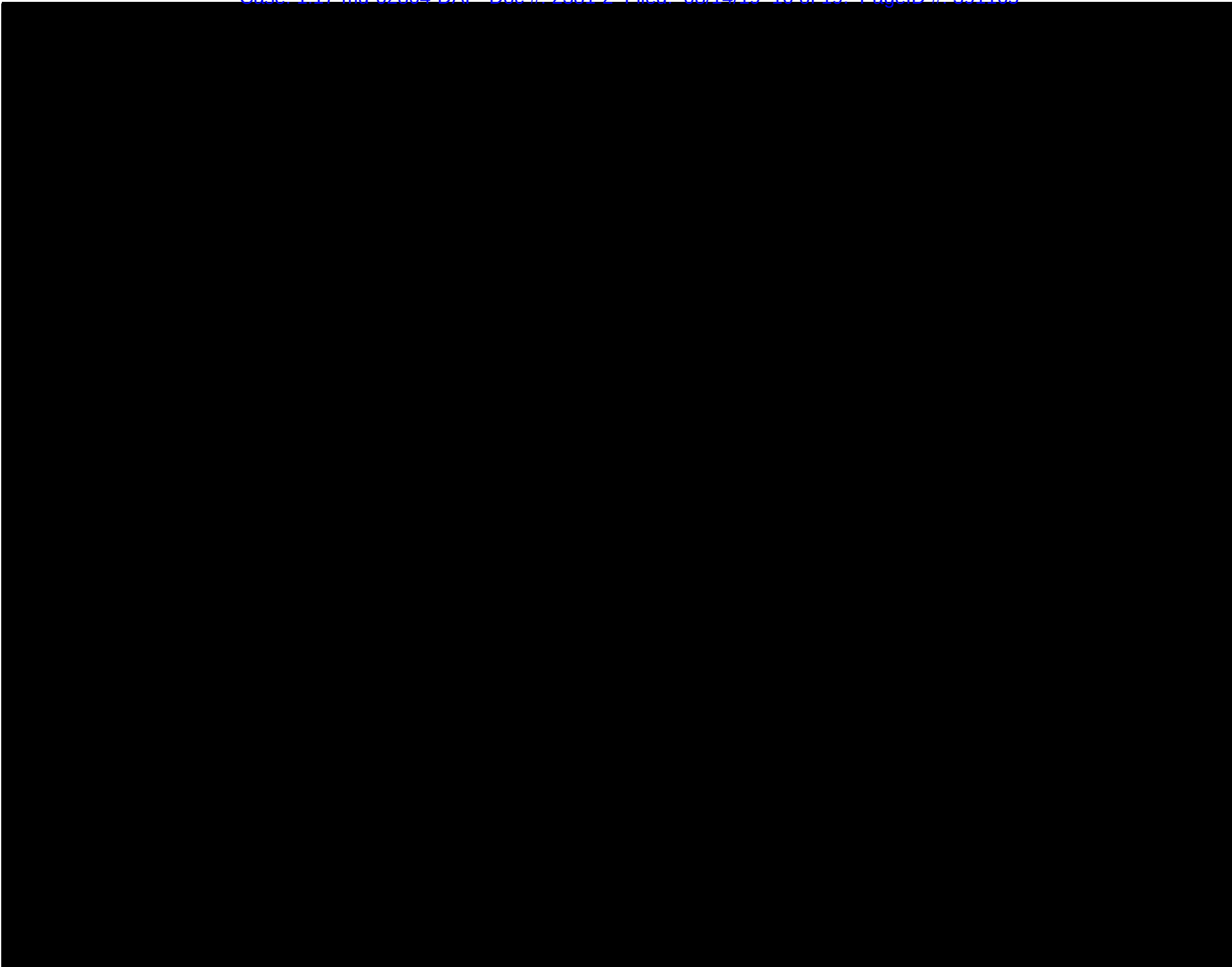
## I. Diversion Control Program - Overview

Enforcement vs. Regulatory - two pronged approach

- Tactical Diversion Squads
  - Special Agents, Diversion Investigators, State & Local Officers, State and Federal Prosecutors
- More Frequent Regulatory Inspections
- Targeted Criminal Investigations

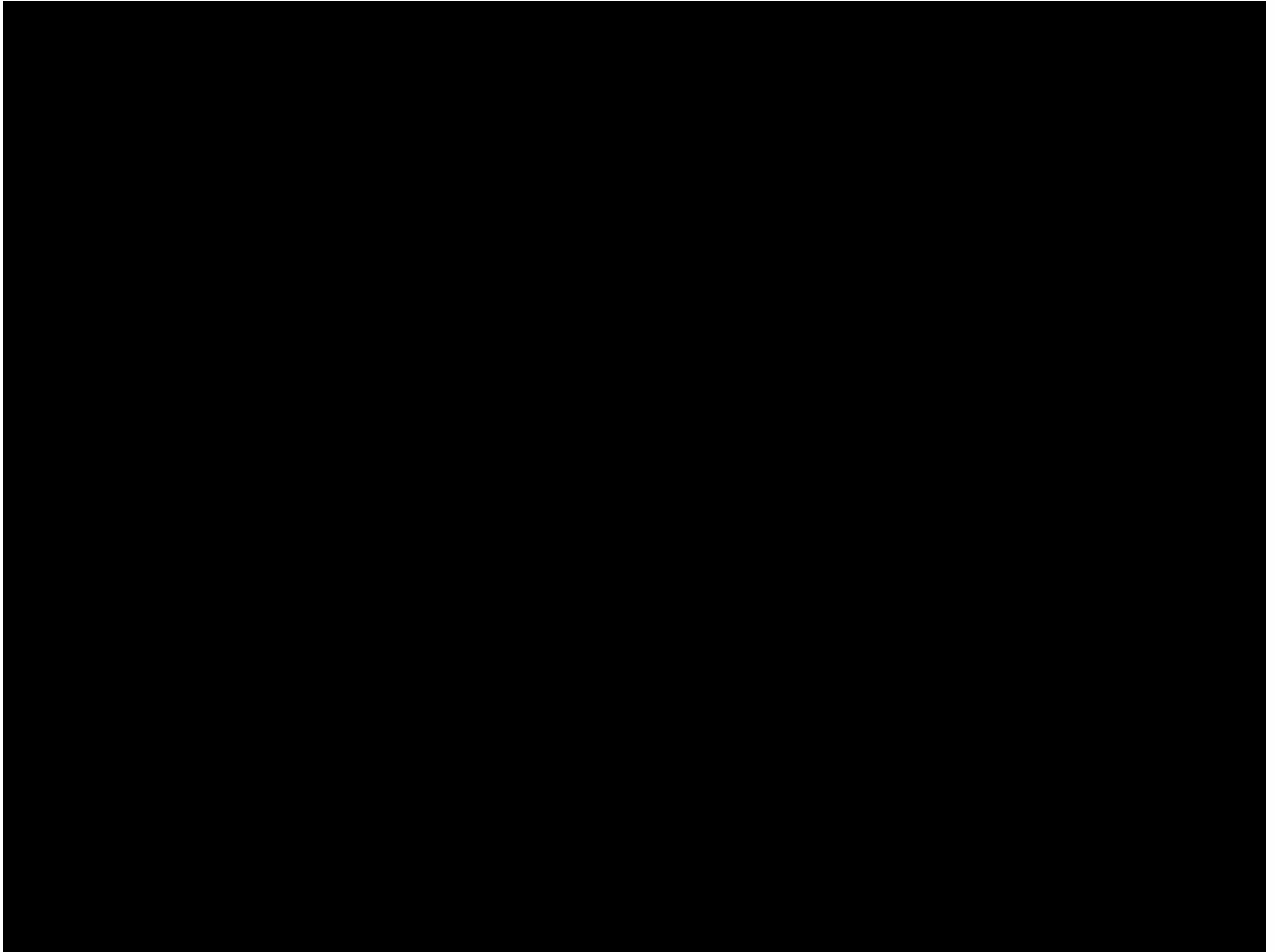


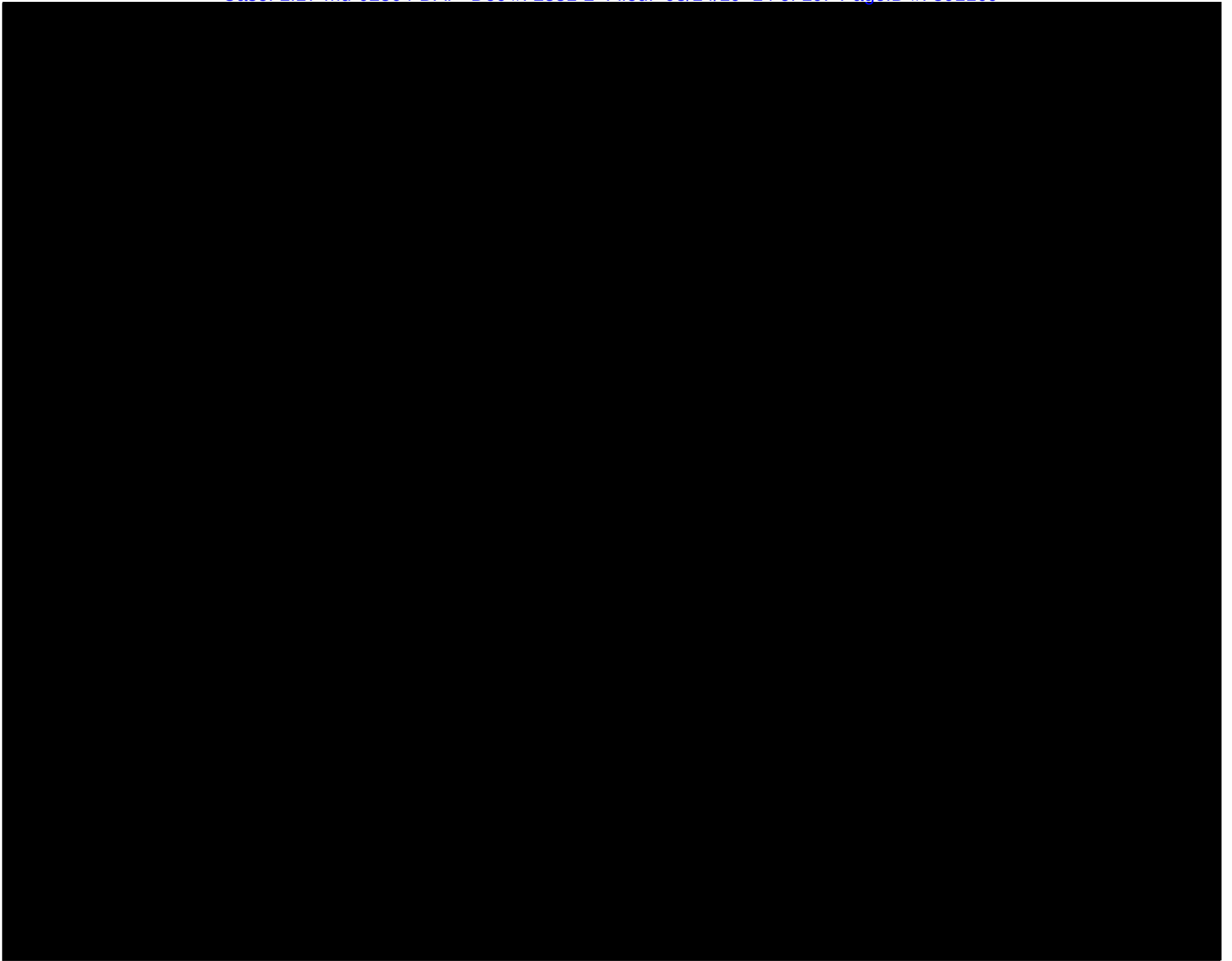




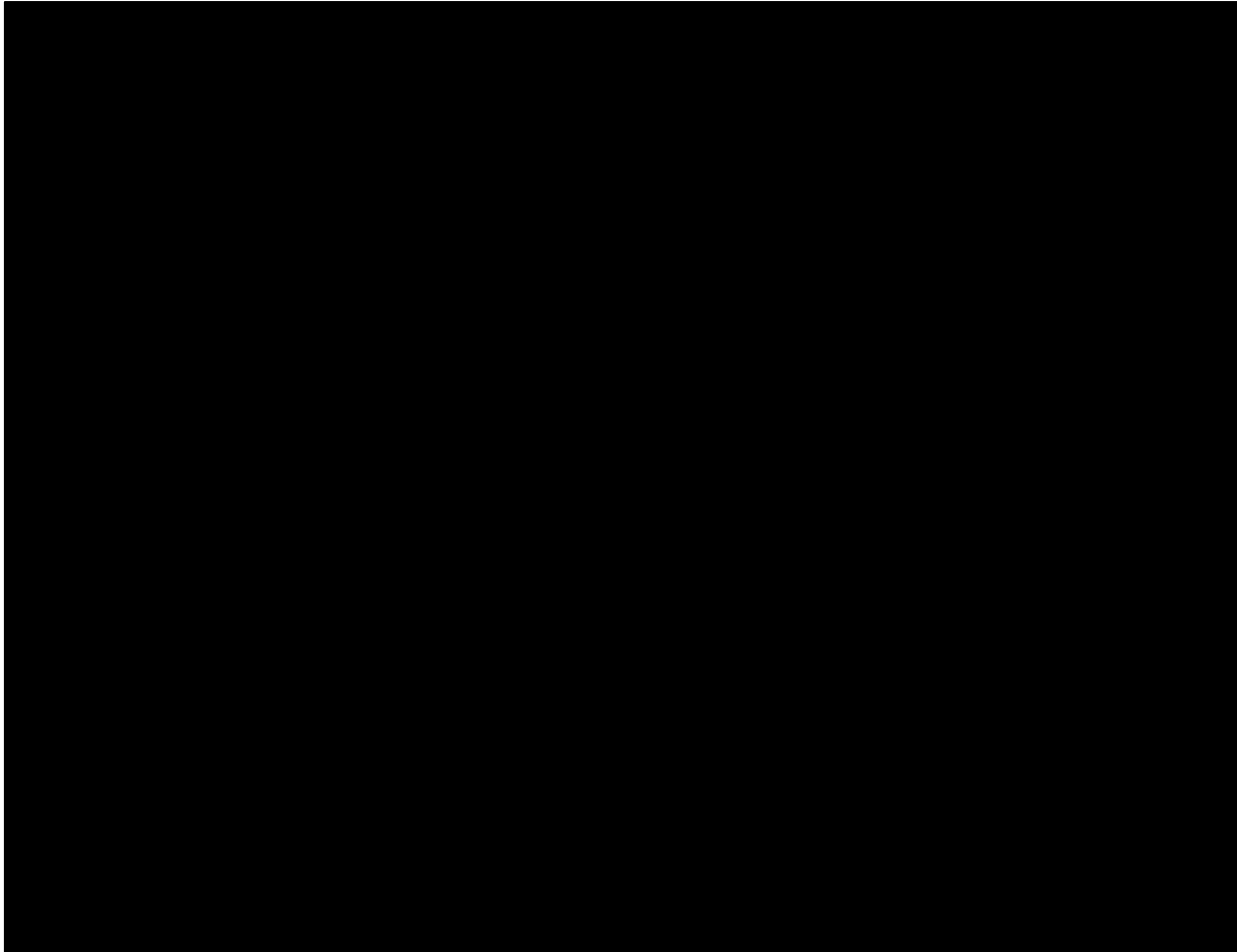


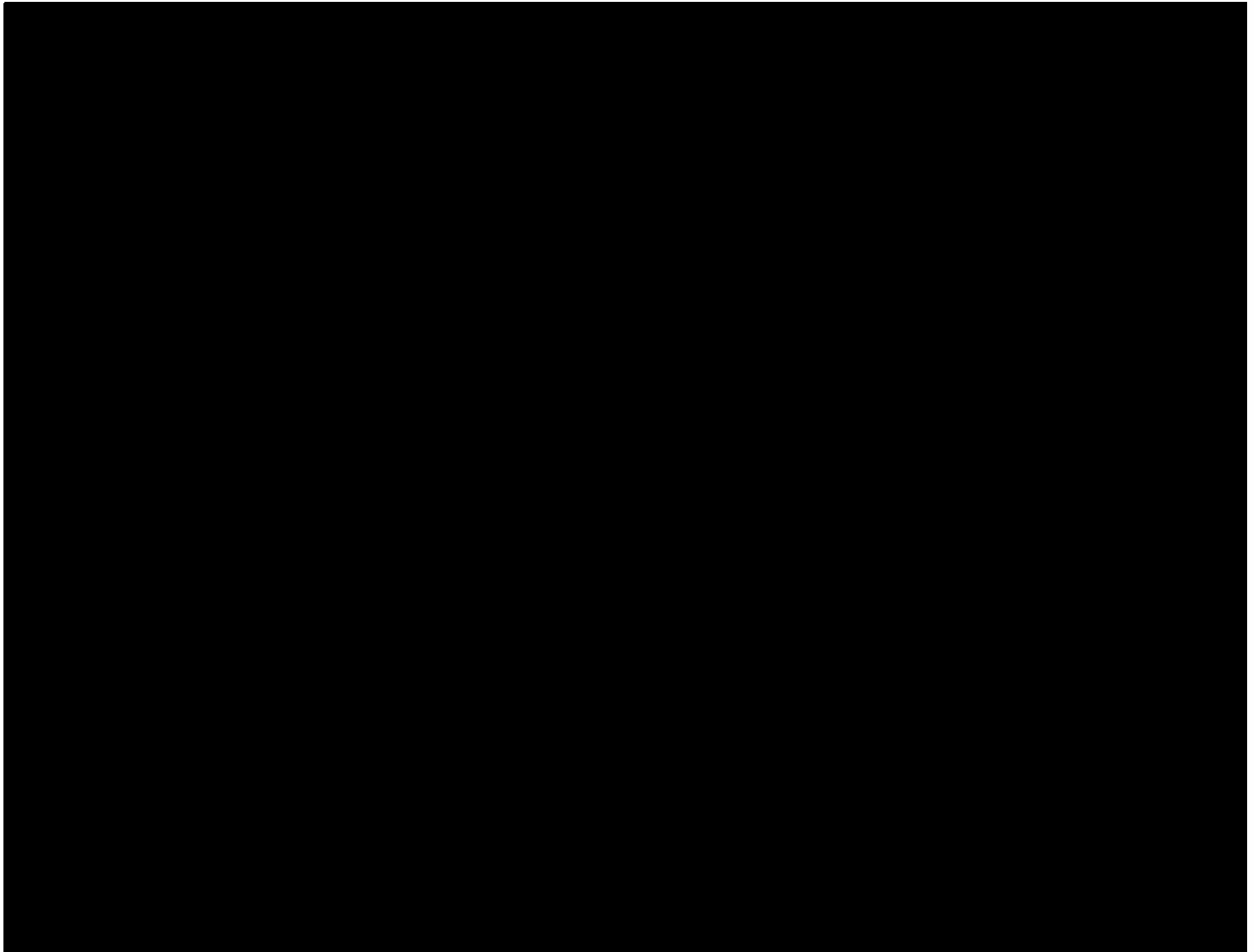


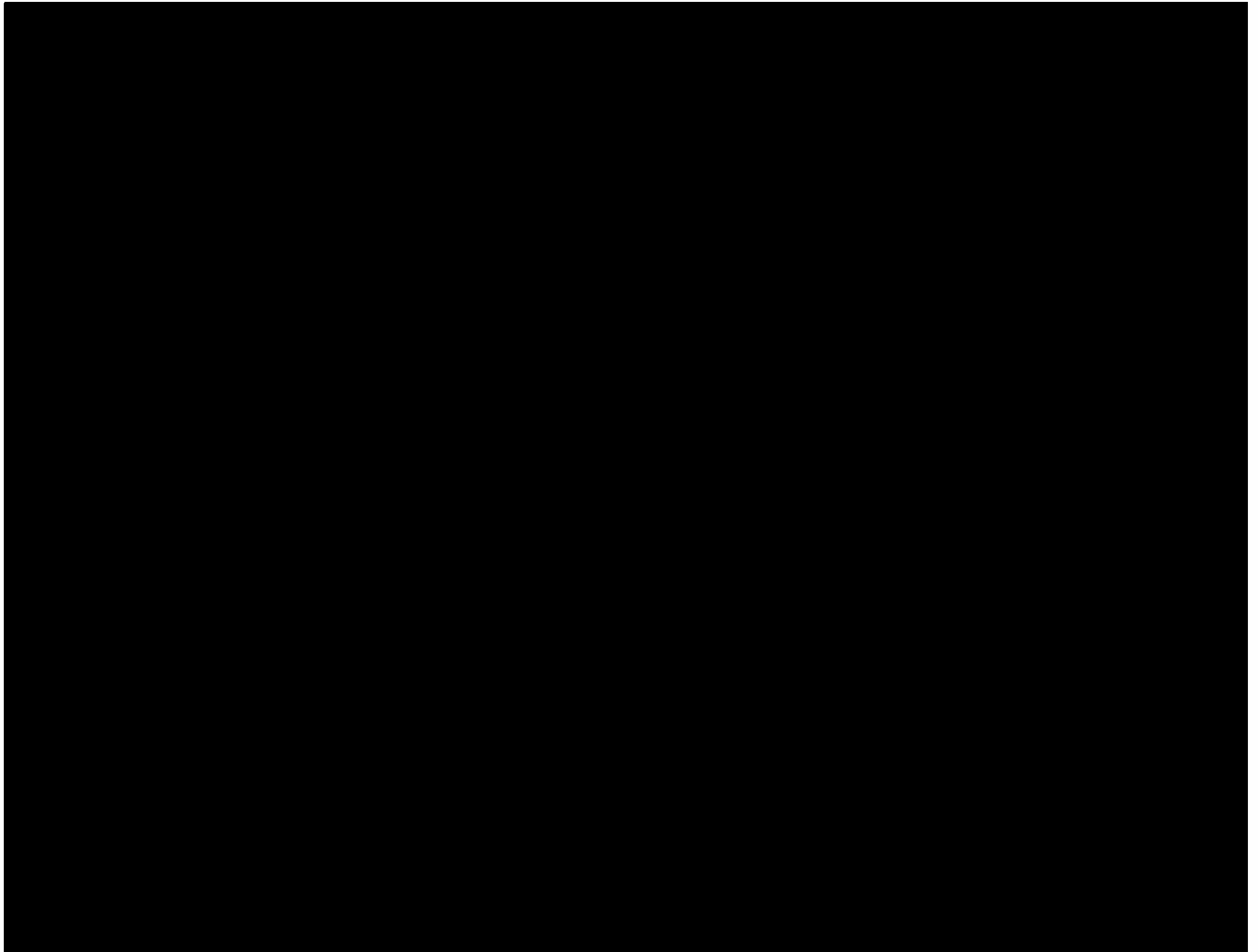


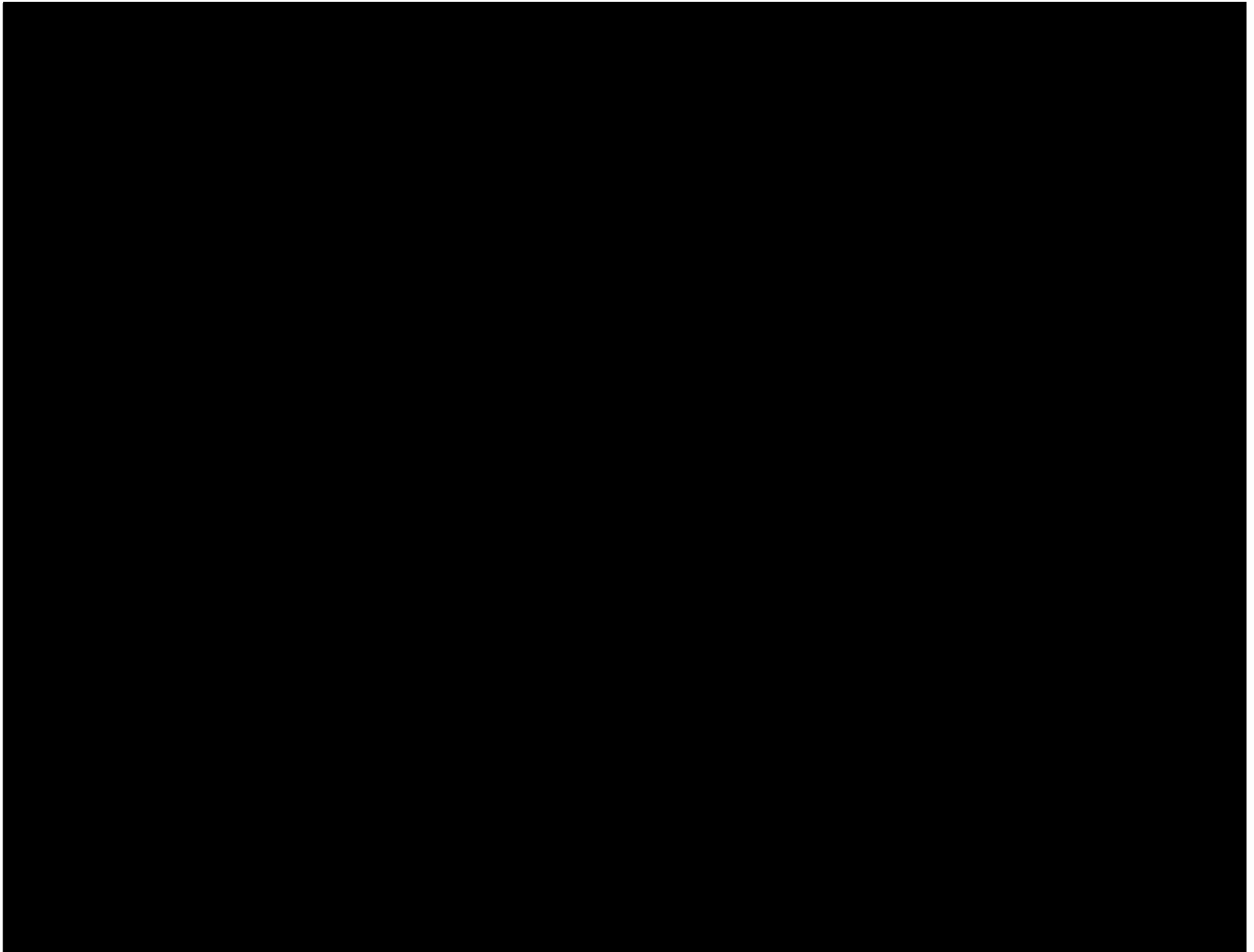














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